

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

JUL - 8 2015

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRIDGETTE SHANKLIN,

Defendants.

4:15CR318 ERW/JMB

INDICTMENT

COUNT ONE

(Conspiracy to Defraud)

The Grand Jury charges:

A. Introduction

1. The United States Environmental Protection Agency is an agency of the United States federal government which was created for the purpose of protecting human health and the environment by writing and enforcing regulations based on laws passed by Congress. It designated the Missouri counties of St. Charles, St. Louis, Franklin, and Jefferson and the city of St. Louis as an ozone nonattainment area because they did not meet the federal health-based air quality standards for ground level ozone, a strong lung irritant.

2. The State of Missouri initiated the Gateway Vehicle Inspection Program in 2007 in a continuing effort to improve air quality in the designated nonattainment area as required by the federal government. As a result, the State subjects all vehicles registered in the area to a combined emissions test and safety inspection.

3. In order to ensure that all vehicles registered in the nonattainment area have met the emissions standards established by the State of Missouri and the United States Environmental Protection Agency, the State of Missouri Department of Revenue requires that residents and businesses of the Missouri counties of St. Charles, St. Louis, Franklin, and Jefferson and the city of St. Louis present evidence that vehicles registered in the area have passed the emissions test.

4. Employees at the Department of Revenue License Offices must collect proof of payment of personal property taxes, verification of financial responsibility, and evidence of having passed safety inspection and vehicle emissions testing in order to register vehicles in the designated areas. **BRIDGETTE SHANKLIN** was employed at the Department of Revenue North County License Office in St. Louis County, Missouri in this capacity between January 1, 2009 and February 6, 2015.

B. Conspiracy

Beginning as early as July 1, 2014 and continuing through on or about February 6, 2015, in the Eastern District of Missouri and elsewhere, the defendant,

BRIDGETTE SHANKLIN,

and persons known and unknown to the Grand Jury did unlawfully, willfully, and knowingly combine, conspire, and agree to commit the offense against the United States of making false statements in a matter within the jurisdiction of a department or agency of the United States, in violation of Title 18, United States Code, Section 1001.

C. Overt Acts

In furtherance of and to effect the objects of the conspiracy, **BRIDGETTE SHANKLIN** and one or more of the unindicted co-conspirators committed and caused to be committed one or more of the following overt acts in the Eastern District of Missouri and elsewhere;

- a. As early as July 1, 2014, defendant **BRIDGETTE SHANKLIN**, an employee of the Department of Revenue North County Licensing Office, was approached by individuals and business representatives wishing to avoid their responsibilities to provide proof of payment of their personal property taxes, evidence of financial responsibility for their vehicles, and proof that their vehicles met the safety and emissions standards of the State of Missouri.
- b. Between on or about July 1, 2014 until on or about February 6, 2015, through electronic transmissions from the North County Licensing Office, defendant **BRIDGETTE SHANKLIN** falsely represented to the State of Missouri Department of Revenue that the individuals and businesses seeking to register their vehicles had produced proof that: their vehicles met the safety and emissions standards of the State of Missouri; the vehicles had passed out of state emissions inspections; and their vehicles were exempt from the emissions requirements.
- c. As a result of the false transmissions made by defendant **BRIDGETTE SHANKLIN**, between on or about July 1, 2014 until on or about February 6, 2015, the State of Missouri issued motor vehicle registrations to individuals and businesses that lacked proper documentation.
- d. Between on or about July 1, 2014 and continuing to on or about February 6, 2015, defendant **BRIDGETTE SHANKLIN** provided individuals seeking to evade the

State of Missouri motor vehicle emissions requirement with fraudulently obtained proof of motor vehicle registration documentation.

In violation of Title 18, United States Code, Section 371.

COUNT 2

(Making a False Statement)

The Grand Jury realleges the facts set forth in paragraph A of Count 1 and further charges that:

B. On or about July 9, 2014, in the Eastern District of Missouri, the defendant,

BRIDGETTE SHANKLIN,

in a matter within the jurisdiction of the United States Environmental Protection Agency, an agency of the United States, did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation, by stating that a 2006 Chrysler sought to be registered in the name of K.R.E. was exempt from the State of Missouri vehicle emissions inspection requirement, when in truth and in fact, as defendant **BRIDGETTE SHANKLIN** well knew, the 2006 Chrysler was not exempt from the State of Missouri vehicle emissions inspection requirement.

In violation of Title 18, United States Code, Sections 1001(a)(2) and 2.

COUNT 3

(Making a False Statement)

The Grand Jury realleges the facts set forth in paragraph A of Count 1 and further charges that:

B. On or about July 9, 2014, in the Eastern District of Missouri, the defendant,

BRIDGETTE SHANKLIN,

in a matter within the jurisdiction of the United States Environmental Protection Agency, an agency of the United States, did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation, by stating that a 2011 Chevrolet sought to be registered in the name of Collins & Hermann, Inc. was exempt from the State of Missouri vehicle emissions inspection requirement, when in truth and in fact, as defendant **BRIDGETTE SHANKLIN** well knew, the 2011 Chevrolet was not exempt from the State of Missouri vehicle emissions inspection requirement.

In violation of Title 18, United States Code, Sections 1001(a)(2) and 2.

COUNT 4

(Making a False Statement)

The Grand Jury realleges the facts set forth in paragraph A of Count 1 and further charges:

B. On or about August 6, 2014, in the Eastern District of Missouri, the defendant,

BRIDGETTE SHANKLIN,

in a matter within the jurisdiction of the United States Environmental Protection Agency, an agency of the United States, did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation, by stating that R.C. had produced proof of an out of state emissions inspection for a 2002 Jaguar he sought to register in the State of Missouri when in truth and in fact, as defendant **BRIDGETTE SHANKLIN** well knew, R.C. did not produce evidence that his vehicle had been subjected to a vehicle emissions inspection by any state.

In violation of Title 18, United States Code, Sections 1001(a)(2) and 2.

A TRUE BILL.

FOREPERSON

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